IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

ANDRES CELEDONIO, et al.,)
Plaintiffs,))
v.) Case No.: 1:15-cv-01079 (LMB/MSN)
DRAINAGE & EROSION SOLUTIONS, LLC, et al.,)))
Defendants.))

JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT

Defendants Drainage & Erosion Solutions, LLC, Drainage & Erosion Solutions Greater Washington, LLC and Kenneth G. Fraine, by counsel, move for Court approval of the settlement reached by the parties in the above captioned matter. In support of this motion, the parties refer the Court to the accompanying Memorandum of Points and Authorities.

The parties waive oral argument.

Respectfully submitted,

DRAINAGE & EROSION SOLUTIONS, LLC, DRAINAGE & EROSION SOLUTIONS GREATER WASHINGTON, LLC, and KENNETH G. FRAINE

By Counsel

/s/ R. Douglas Taylor, Jr. Richard C. Sullivan, Jr., VSB #27907 R. Douglas Taylor, Jr., VSB # 38360

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-and-

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of March, 2016, a true and correct copy of the foregoing was served by ECF as follows:

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